

## INTEGRATION POLICIES IN FRANCE AND THE UK: AN ANALYSIS OF THE DISCOURSE SURROUNDING WOMEN'S RIGHTS WITHIN CIVIC INTEGRATION HANDBOOKS

'Core values' and 'a sense of belonging' have become two of the most popular phrases in political jargon in the UK in the last few years, and in France issues of '*identité nationale*' (national identity) echo the same rhetoric. Both states are largely gearing this discussion towards issues of immigration and integration: they have seen a significant turn-around in their approaches to immigration and integration policies, arguably converging in their policies despite the fact that historically they have maintained divergent philosophies in matters of citizenship. This discourse on integration comes at a time when there is a perceived lack of cohesion within these societies, due to a range of factors which some allude to being the general disintegration of societal ties in postmodern times (see Bauman 2000), others to the decreased importance and identification with the nation-state (see Soysal 1994), and yet others with the problematic of cultural pluralism, as hailed by Samuel Huntington in his book, *Clash of Civilisations and the Remaking of World Order*. Added to this, of course, is globalisation and the steady flow of immigrants through national borders. This lack of cohesion and tension within the society has had a real, violent and fearful face: In the UK, the London bombings of 2005, preceded by the urban unrest in Oldham, Burnley and Bradford in 2001 are evidence. In France, the civil unrest in the urban *banlieues* (suburbs) in 2005 succeeded in placing societal tensions in the media spotlight. The policies being made echo the public discourse in this domain – there is a need to build a greater sense of belonging, identity, and to integrate the various groups and individuals within society, while excluding those who do not belong.

How have these two states dealt with this lack of cohesion within their societies? The discourse surrounding this debate has been heavily centred

on 'core values' and 'Republican principles' that these societies would like to identify themselves with. These values are either discussed in universalist categories, such as the adherence to human rights, equality and individualism, democracy and rule of law, or a strict adherence to the law. The discussion of these has infiltrated into the making of 'civic integration' or 'welcome' (*accueil*) handbooks and courses that are meant to provide newcomers with practical information and cultural guidance for their host country, and to prepare them for an 'integration' test that is a necessary requirement to gain permanent residence or citizenship. The goal: to transmit the values and principles that are important to building and fostering national cohesion.

The value of equality is of notable interest in this discourse, permeating across ethnic, national, generational and gender lines, and rooted deeply in both French and British ideologies, albeit marked by starkly different approaches. While these two nations believe they stand as the harbingers of equal rights, within their societies a battle is raging which, as it turns out, has diverse interpretations depending on the perspective one takes, whether it is individual, group, cultural or that of a minority. Does one need to be treated differently in order to be equal? Might something that may look submissive and discriminatory towards, say, women, in fact be liberating for them, if one takes into account a certain cultural background? In trying to grapple with these issues, these states are scrambling to come up with a strong, cohesive idea of what their values really are. This in turn has affected how these two countries are trying to portray themselves, and how they wish to transmit these values to those newcomers seeking to reside on their soil. Women's issues are particularly salient in this debate, since the discussion on gender equality cuts not only through immigration and integration issues, but touches the deepest recesses of the societies themselves. What kind of image of gender equality do these societies uphold, and is this image a clear and accurate one, or diverging from realities beneath the surface?

It is the aim of this paper to study how the issues of gender equality are approached in the discourse surrounding the making of integration policies, and specifically civic integration 'handbooks' for newcomers, and how they are transmitted to immigrants through the content and form used. From this analysis some conclusions may be drawn, firstly on how salient this issue is in the eyes of those policy-makers dealing with the integration of migrants, while also revealing what kind of image of the society it is trying to reflect. Furthermore, the way in which the values are transmitted (i.e. is the information tacit or explicit? prescriptive or descriptive?) are not only reflective of this

national self-image, but may also raise questions as to the effectiveness of this transmission and how it may be received by new immigrants.

The first part of the article is concerned with presenting a theoretical background to the immigrant integration philosophies in both countries as it pertains to women's rights and equality in society: what are the convergences and divergences between the ideologies in these two societies, and how are women's rights reflected in this discourse? In the second section, a discourse analysis of the discussion surrounding the making of the civic integration handbooks and the topic of women's rights/role in society in this debate will aim to conclude what kind of institutional self-perception these two countries have emitted in terms of gender equality, and how they converge or diverge in their content. What can we learn about these two countries by the way they deal with this issue? Is there a dissonance between the philosophies and the practice of integration? The third part of the essay focuses on the effect this discourse may have on newcomers' perceptions of gender equality. Here, a critical discourse analysis of the handbook itself, with specific attention paid to the form and content of what is written, will be the methodology used. The questions at stake are: are these issues written in a descriptive or prescriptive fashion? Is the language passive or active? Are women's rights and their role in society presented tacitly or explicitly? In answering these questions the article aims to shed light on the convergence and divergence in the approach to women's issues in France and the UK in regards to the integration of migrants, and how these issues may, in theory, be perceived by those newcomers in the two host societies. This research is meant as a precursor to empirical studies on migrants themselves and their actual perception of how gender issues are transmitted through integration measures in these two countries.

## Theoretical considerations: Diverging philosophies of equality in France and the UK

Both France and Britain, founding liberal, democratic nation-states, are meant to embody the principles of liberty, equality, toleration and justice (Favell 2001; Rawls 1999). The inherent paradox between these universal values and the principle of the nation-state, which seeks to build an exclusive unity and identity amongst those chosen to be its citizens, is one that is confronted in the domain of immigration and integration. The former domain is problematic in terms of who we allow to enter through the gates and who we reject from

our sphere of liberty, tolerance and equality. Who is more privileged amongst equals? This issue is a salient one for liberal democratic states in the era of increased global mobility and advances in communications technology. The latter issue, integration, has also to face up to burning questions in terms of the principles of democracy – how to deal with the plurality of values and views within a multicultural society that are in opposition with the principles of liberal democracies? Adrian Favell, in his seminal book *Philosophies of Integration*, precisely sums up the fundamental question:

How can a political system achieve stability and legitimacy by rebuilding communal bonds of civility and tolerance – a moral social order – across the conflicts and divisions caused by the plurality of values and individual interests? (2001: 2).

How are these two countries rebuilding a moral social order to revive cohesion and integration within their borders, and specifically in terms of interpreting the value of *égalité*, focused here on gender equality? What I aim to analyse in this section are the two countries' approaches to issues of equality in light of the plurality of values and cultures within their respective societies. Here I use the framework of Favell's 'public philosophies', which refer to general ideas and linguistic terms held consensually across political party lines within the state, that can be analysed into its respective normative and explanatory goals and assumptions (Favell 2001). In Britain, issues of immigration and integration have, in the past, converged around two terms: *race relations* and *multiculturalism*. The latter here is of importance to the issue of gender equality. In the ideology of multiculturalism, human beings are considered to be both natural and cultural beings, sharing a common human identity but in a culturally mediated manner. Equality is grounded not in the uniformity of human nature, but in the interplay of uniformity and difference, building difference into the concept of equality (Parekh 2006: 240). Equality thus involves equal opportunity to be different, and treating human beings equally may require treating them differently in light of their cultural backgrounds.

What does this practically imply for women – and specifically those who come from different cultural backgrounds – in the British society? This has meant that there is a greater acknowledgement of cultural differences and needs, which expands the meaning beyond race and ethnicity to include gender, sexuality and disability (Hesse 2000: 9). It is, in practice, the public recognition and support for different minorities and identities, including women. Let's take for example the practice of positive discrimination or 'affirmative action' in the workplace, which is often in the form of an employment policy that seeks to fill a certain percentage of positions by women, even if they are no

more qualified than men who are competing for the same position. This logic follows the idea that for women to be equal to men the patriarchal system needs to be broken down first to allow them equal opportunity. In the cultural realm, we can cite the example of a Sikh woman in Britain who was refused admission on a nursing course by her Health Authority because she intended to wear the traditional dress of long shirt over baggy trousers. She then went to the Industrial Tribunal and her complaint was upheld on the grounds that since her traditional dress was a cultural requirement and did not impede her duties as a nurse, the nursing uniform was an unjustified requirement (Parekh 2006: 246).<sup>1</sup> These policies are at the heart of multiculturalism, which acknowledges and nourishes cultural and other differences between human beings.

However, multiculturalism policies have largely been criticized by feminist theorists, who claim that group rights often take precedence over individual rights, and the former may have a culturally oppressive character in relation to women, leading to the negation of these Western democratic states' progress in the field of gender equality (see Okin 1999). The issues here are minorities within minorities who are oppressed individuals within groups and left vulnerable by group rights without the possibility to escape, or the 'right of exit'. How can we make sure that differential treatment does not serve as a cloak for discrimination or privilege, of tolerating the intolerant?

Growing scepticism to multiculturalism in the UK has in the last decade changed the nomenclature somewhat to a more centrist policy of *civic integration* and *cohesion*. While multiculturalism was known for its support of group rights and group identity, civic integration and cohesion underline the importance of common shared values and feelings of unified belonging. This shift away from the rhetoric of multiculturalism was marked by New Labour's ascent to political power in 1997 and the increase in talk of 'Britishness', common British values and sense of national belonging. The Cantle Report of 2001, an independent review of community cohesion in Oldham, the site of urban 'race riots' in the same year, came to the following conclusions: "while there is an urgent need to promote community cohesion, based upon a greater knowledge of, contact between, and respect for, the various cultures" there has to be a "greater sense of citizenship based on (a few) common principles" (Home Office 2001: 10). Further, whilst the report underlines that the "re-

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<sup>1</sup> In this case the Industrial Tribunal was actually overruled by the Employment Appeal Tribunal, which took the opposite view. In the end, a mediated conclusion was drawn: the Sikh woman would be taken on the course as long as her trousers were grey and her shirt white.

spect for different cultures is vital", common elements of "nationhood" need to be agreed upon (Home Office 2001: 19). Here it mentions a more visible support for anti-discrimination measures as well as support for women's rights (ibidem). We see thus that whilst the concept of multiculturalism and respect and acknowledgement of difference is still part of the national psyche, the push towards a more robust sense of nationhood and espousing common values is the growing trend.

Some observers, such as Christophe Bertossi, seem sceptical of this new approach, remarking that the return to the national has seen the setting-up of national identity in the form of "common belonging" which marks Islam as the threatening 'other', and that the related themes which were traditionally held by far-Right parties have now become commonplace (2007: 6). Yet others point out that there is a danger that this sense of British 'cosmopolitanism' or 'civic identity' rather than a critical sense of the multicultural may be guiding Britain in the wrong direction (Hesse 2000: 27). However, even some multiculturalists see it as a normal and indeed necessary tool for societal cohesion and the smooth integration of its diverse citizens. As Parekh in his book *Rethinking Multiculturalism* aptly observes: "Paradoxical as it may seem, the greater and deeper the diversity in a society, the greater the unity and cohesion it requires to hold itself together and nurture its diversity" (Hesse 2000: 196). Others have followed this line of reasoning: prominent sociologist Anthony Giddens in his book *The Third Way. The Renewal of Social Democracy* argues in favour of this new cosmopolitanism which embraces heterogeneity while recognizing the importance of national solidarity.

What has this changed in the concept of women's rights and the issue of gender equality? In practice, policies protecting and supporting minority rights have not been abolished; however, a more robust push towards actively promoting British 'common' values has been developed, and a sense of equality is at its core. In the new Equality Bill, introduced in 2009, Rt Hon. Harriet Harman, Minister for Women and Equality, states: "Britain is now a fairer and more confident nation because our commitment to greater equality has been at the heart of public policy", and further notes that "a more equal society is more cohesive and at ease with itself" (Government Equalities Office 2009: foreword). There have also been other reports and commissions summoned to research pressing women's issues. A 2000 report entitled *A Choice by Right: The Report of the Working Group on Forced Marriage*, was commissioned by the Home Office under Labour Home Secretary David Blunkett, who, according to Christian Joppke, has openly scrutinized certain minority practices – spe-

cifically forced marriages – which so far no one had dared to comment upon (Joppke 2003: 12). The Choice by Right report reads: “In today’s Britain we are negotiating new common values too, based on equality and respect between men and women, and between people regardless of their race, faith or ethnicity. These values are based on building a culture of common human rights” (Home Office 2000: 4). While the language used to underline the adherence to human rights and gender equality is somewhat fluid, i.e. “we are negotiating new common values” (were these values not enshrined into the British set of values before, one could ask) one can easily find an excuse for this type of approach: identity and values, as pointed out by Zygmunt Bauman, is a constant and fluid process (Bauman 2000). In this new rhetoric surrounding Britishness and British values: “liberty for all, responsibility by all and fairness to all” (Brown 2006), there is a strong notion of equality “for all”, as is evident from the progress that has been made in policies over the last decade. However, as we shall see in the next section, the language of integration policies is much less assertive in its treatment of the issue.

To sum up, an example of how this still somewhat ambiguous cultural vs. individual rights debate has been felt in practice is shown: A British-Asian girl, who had married her husband (chosen by her parents) because of the threat of ostracism by her family, asked the courts to annul her marriage on the grounds of duress<sup>2</sup>. The court declined her case because duress, according to the law, is only when there is an imminent threat to life or liberty. This verdict was heavily criticized, and indeed a few years later in a similar court case, another Asian girl won, and thus the court completely changed its views. The court took the view that although acute social pressure did not amount to duress for a white British girl, it did so for her Asian counterpart (Parekh 2006: 248). This example shows that women’s rights find themselves somewhere in the ambiguous realm between cultural differential treatment (it was acknowledged that the Asian woman has different rights to make her equal to a white woman) and equality (a white woman would not have been granted the same decision, for societal/family pressure is not as socially ostracizing as to be termed ‘duress’).

While Britain is filled with these ambiguities, its southern neighbour is, at least ostensibly, quite clear on what it considers to be its national values. In France, the republican individualist doctrine of citizenship can be summed up with the well-known motto: *liberté, égalité, fraternité*. But what does this mean

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<sup>2</sup> A forced marriage is one conducted without the valid consent of both parties, where duress is a factor (Home Office 2000: 4).

in terms of its public philosophy, especially when concerning immigration and integration of newcomers? While in Britain the key words have been *race relations* and *multiculturalism*, the buzzwords in the French public philosophy are *citoyenneté* and *intégration*. France adheres to a universalist (albeit 'typically French' universalist) tradition and a culturally specific form of integration. The Republican citizenship model is based on the primacy of the individual citizen and a national political identity (Bertossi 2007: 3).

This ideology is built on a framework of civic individualism and national modernity: civic individualism sees the individual as the only focus of rights, and refuses any form of distinction on ethno-cultural lines in the public sphere, which is seen as a place where shared citizenship can flourish (ibidem). In theory, all citizens are equal and thus do not need to lobby for group or minority rights; in France, group rights are fervently opposed and minorities – particularly ethnic minorities – are not even taken into consideration in the census data. It is only in the last decade that sociologists and demographers have been realizing the need to introduce some sort of 'ethnic' classification, in order to identify the growing immigrant populations (Favell 2001: xiv). Under the *Haut Conseil à l'intégration* (High Council for Integration)<sup>3</sup> chaired by Patrick Weil, some plans were drawn up to introduce new forms of anti-discrimination legislation in France (Favell 2001: xv).

On the other side of civic individualism lies the state, with its strong centrist, unifying identity to counterbalance the abstract individual. According to this ideological system, everything that is not classed as national is seen as suspect in terms of identity (Bertossi 2007: 3). In this realm of the national, the values of liberty, equality, secularism, and brotherhood dominate the rhetoric, but identity is not limited to modern civic values: France has maintained a strong myth of its foundation, and one of its stories is of France as a woman, a mother. Before it became a nation, it is often said that France was a mother, a gentle mother that guaranteed perpetuation of life: fertility and the womb of protection. Further still, "*Marianne*", the allegorical figure of the French revolution, encompasses the values of the Republic and that of its citizens; she is the symbolic representation of the mother-nation (Yonnet 2008). While this myth of a '*douce France*' ('gentle' or 'soft' France) perhaps does not have a direct effect on the making of integration policies, it certainly has an effect on the way women's issues are reflected in this discussion, and how pertinent they are to the self-understanding of the nation, as will be discussed in the next section.

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<sup>3</sup> Created by governmental decree in 1989, its mission is to propose and support action to integrate immigrants into the French society. It is a state organ.



The legal framework of *égalité* is founded on the Republican *Déclaration des Droits de l'homme et du citoyen* of 1789 (The Declaration of the Rights of Man and Citizen) and the 1958 constitution that proclaims the equality of all citizens without distinction of origin, race or religion. It is perhaps to the disadvantage of France that the inherent inequalities of the system are grounded in a written constitution founded in 1789: whereas in Britain it is the Human Rights Act of 1998 that is legally laid down in the law (taken from the European Convention of Human Rights of 1950), France in its constitution still has the vestiges of the French Revolution and the nomenclature from the 18<sup>th</sup> century which, even at that time, were outwardly criticized by prominent women<sup>4</sup>. While France has since ratified the Convention on Human Rights as well as the European Charter on Human Rights, the Declaration of *Men's* Rights is still the first article in the French constitution. The French society did not grant women the right to citizenship until 1944, as compared to Britain, which extended universal suffrage to women and men equally in 1928.

The French system, while quite clear on its national character and the values which should be espoused within it, is not, as we see, without contradictions and controversy. The example of the *Affaire de Foulard*, which commenced in 1989 and saw a recent manifestation in 2003, best reveals the weaknesses of the system. In short, the affair started when a teacher in an ethnically mixed school objected to three Muslim girls wearing the *hijab* (headscarf) on the grounds that it went against the *laïcité* (secularism) of the French state schools (Parekh 2006: 249). The *Conseil d'état* (Council of State) first ruled that the *hijab* did not violate the principle of secularism, but after numerous protests and a flaring up of the situation again in 1993, it was ruled that while wearing 'discreet' symbols was acceptable, "ostentatious symbols which in themselves constitute elements of proselytism or discrimination" were unacceptable (Parekh 2006: 250). Much to the surprise and dismay of many Muslim girls, the *hijab* fell under that category. The school must be a "place of emancipation", and the *hijab* was particularly objectionable because it was seen to symbolize the subordinate status of women (Parekh 2000: 250).

When the same issue arose again in 2003 and another law was passed banning the *hijab* in schools on March 15<sup>th</sup> 2004 (Bertossi 2007: 28), Muslim

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<sup>4</sup> Notably in France, Olympe de Gouges in 1791 published the *Déclaration des Droits de la Femme et de la Citoyenne* – not just Woman contrasted with Man, but *Citoyenne* contrasted with *Citoyen*. In Britain, Mary Wollstonecraft published the widely known „Vindication of the Rights of Women“ in 1792. De Gouges was sent to the guillotine a few years later, Wollstonecraft died due to childbirth complications.

girls spoke out against the ban on the very grounds of equality that the ban seemingly endorses. "People say that it's the women who wear the veil that are submissive (...) but I think it is those women who are submissive, because it is what men want, women half-naked" (BBC news, Monday 28<sup>th</sup> March 2005). While the common argument for the ban is that these girls are being forced into doing so, in interviews with Muslim girls and their families, it is often the case that their parents try to persuade them to take the headscarf off, while they insist that it is an intrinsic part of their identity (BBC news, Monday 28<sup>th</sup>, March 2005). However, the headscarf ban has not been lifted and no recall has been made as to the perhaps wrongly labelled subordinate and discriminatory features of the *hijab*.

While the headscarf affair cuts deep into the French values of *laïcité*, French ideologies of feminist equality, and a growing schism between Islam and the 'West', it is perhaps unfair to consider this as the representative example of French policies in dealing with cultural pluralism. There is much proof in the way of France moving towards a more Anglo-Saxon approach to integration, evident in the emphasis placed on anti-discrimination policies since 1997 (Bertossi 2007: 28), which in itself is admitting to the fact that people within the French society are not always treated equally and that more needs to be done than just trumpeting French values. In 2002, the French Council for the Muslim Faith (Conseil Français du Culte Musulman, CFCM) was created in order to represent Muslims in France, and in the last years, literature that is widely accepting of the issue of ethnicity has opened up thanks to the debate surrounding discrimination (Bertossi 2007).

To sum up, recent comparative studies of immigrant and integration policies in Britain and France do point in the same direction: that of a convergence in policies, France on the one hand moving at the end of the 1990s towards the theme of anti-discrimination, and Britain, on the other hand, steering towards a new agenda focused on 'community cohesion' that espouses national values of 'living together'. The latter is closer to a Republican ideology than a multiculturalist British one: there is a shared vision and sense of belonging to be forged, and a focus on strong relations between *individuals* belonging to different communities (Bertossi 2007: 29). The question that now arises is: how are these turns in policy influencing the rhetoric surrounding equality and its place in national identity in these respective countries, and specifically, in the transmission of these values to newcomers?

## Institutional self-perceptions and discourses surrounding gender equality in the making of integration policies in France and the UK

In this section, a discourse analysis of the discussion surrounding the making of the civic integration handbooks and the topic of women's rights/role in society will aim to conclude what kind of institutional self-perception these two countries have emitted through integration policies in terms of gender equality, and how they converge or diverge in their content. What can we learn about these two countries by the way they deal with this issue? Is there a dissonance between the public philosophies, analyzed in the previous section, and the practice of integration? In dealing with this issue, the article focuses on three primary sources that directly influenced the making of the new immigration and integration policies in both countries – The British 2003 White Paper entitled *Secure Borders, Safe Haven*, as well as *The New and the Old* Crick advisory report on integration policies, and the French report entitled *Le Contrat et l'intégration* prepared by the *Haut Conseil à l'intégration* – which led to the making of 'civic integration' handbooks and, in the French case, the reforming of the *contrat d'accueil* and the teaching material to prepare newcomers for civic integration 'tests' in both countries. Before we embark on the discussion of how France and Britain have appropriated the value of equality into their institutional self-understanding or national identity, it is first necessary to define the term and lay the theoretical background to the subject. In this paper, I take it for granted that identity is a fluid concept, a never-ending process that is not a static entity that, once defined, is confined to its categorisation (See for example Bauman 2000). National identity is understood here as an 'imagined community' (Anderson 1983) that we can divide into four levels of belonging (Laborde 2002: 598):

- The first is that of ethnic, 'primordial' links based on birth and kinship;
- The second is that of the broad culture, language, ways of life and social customs characteristic of a particular community;
- The third is that of the political culture, embodied in political institutions, practices, symbols, ideological and rhetorical traditions, and so forth;
- the fourth level is that of abstract, universalist political ideals and procedures, usually expressed in the form of general principles outlined in the constitution.

On the first level we are dealing with the principle of *ius sanguinis* and the idea that national identity and belonging are forged on ethnic blood-lines.

Many European nation-states hold on to this principle at least partially by offering short-cuts to citizenship for those who have blood-ties to that country, while guaranteeing the principle of *ius soli* – citizenship and belonging based on birth within the state boundaries. Until recently, Germany fell into this first category, making it extremely difficult for those without German blood to acquire German citizenship.

The second level is what is typically thought of when we talk about national identity – the fact that Brits go down to the pub after work on Friday and drink beer, while the French drink wine and eat cheese – and often forms the basis of stereotypes that we associate with a particular nation-state and people. This has been the biggest point of contention in the British discourse because of the particular sensitivity to its colonial past and generally a politically correct hesitation to impose its culture on others. France, on the other hand, traditionally indulges on this level, recalling the myth of its founding and the values espoused in the Republic.

The third level is identification with the state as such, including the historical institutions that have forged its current form. This level of identity may be linked with what is referred to as civic nationalism, largely expanded by Jean-Marc Ferry, which focuses national identity on the political sphere while acknowledging that political institutions and practices cannot be entirely separated from their wider cultural background (Laborde 2002: 10). Civic nationalism was conceived largely in response to Jürgen Habermas' constitutional patriotism, which constitutes the fourth level and holds that the basis of citizenship and belonging in a society should be the adherence to universalist principles that are separated or 'uncoupled' from the cultural identity of the state (ibidem: 4). It is based on the commitment of citizens to neutral liberal principles and procedures and is the most inclusive and culture-neutral of the four. While there are different strands in constitutional patriotism and the topic requires a whole separate discussion, what is important is that it tends towards a pure form of cultural neutrality by emphasizing allegiance to institutions and symbols which are potentially universalizable; 'values' over 'identity' (sharing universal values of democracy and respect for justice and rights as opposed to sharing an identity, in the sense of shared language, associations and culture); and 'procedures' over 'substance' (ibidem: 7).

These four levels of national identity are, at their extremes, the traditional ethnic-civic divide in nation-state identity formation, as defined by Rogers Brubaker. In reality, however, the process of national-identity building is never merely on one level or at the extremes of the spectrum, but is constantly in

progress, shifting and dependent on various factors, such as political atmosphere, parties in power, and factors such as economic situations and perceived threats (i.e. terrorism, migration). I thus do not aim to show what British and French identity are, but how the discourse about the value of equality is reflected in national identity particularly in the context of integration policies, in order to ascertain its inclusiveness and potential for communicating this value to newcomers.

To enable integration to take place, and to value the diversity it brings, we need to be secure within our sense of belonging and identity and therefore to be able to reach out and to embrace those who come to the UK (Home Secretary, the Rt Hon. David Blunkett MP).

This quote from the Home Secretary was stated in the Forward to the White Paper and set the tone for the whole document and indeed for the re-conceptualisation of integration policies for immigrants. In the executive summary David Blunkett makes clear that “The first challenge migration poses is to our concepts of national identity and citizenship” (Home Office 2002: 10). That national identity and citizenship is placed at the top of the agenda in front of economic issues, asylum, fraud and border controls – as the order of the chapters of the document clearly showed – is further evidence of its importance in the domain of immigration policies; this was not the case in the previous White Paper dealing with immigration and asylum issues, wherein the topic of identity and belonging did not once come up, but was focused on asylum matters and backlogs in bureaucracy (Home Office 1998). Therefore the first point to emphasise here is this: national identity and the discussion of core values in the making of these specific integration policies was, as is explicitly stated in the 2003 White Paper, of primary importance.

The White Paper goes on to say that in certain respects British citizens are in a crisis of belonging, because the state has failed in its attempt to integrate its diverse society. It cites the disturbances in Bradford, Oldham and Burnley as a sign of the disintegration of society and blames this as the lack of “a sense of common values or shared civic identity to unite around” (Home Office 2002: 10). According to the White Paper, the government plans to address this disintegration by initiating “an open and constructive debate about citizenship, civic identity and shared values” (Home Office 2002, Point 7: 11).

While Blunkett places a strong emphasis on a common sense of belonging and enshrining a sense of “British” values, he is not so clear on what these values are supposed to encompass. In terms of equality, the Human Rights Act of 1998 is referenced but does not go further than saying that “The laws, rules

and practices which govern our democracy uphold our commitment to the equal worth and dignity of all our citizens” (Home Office 2002: 30). He does go on to take a stance on inequality fuelled by cultural differences: “It will sometimes be necessary to confront some cultural practices which conflict with these basic values – such as those which deny women the right to participate as equal citizens” (ibidem). The latter quote is a direct jab at the weaknesses exposed in multiculturalism policies: the confrontation of cultural differences with the individual rights, and particularly values of equality.

The questions that surface here are: What type of national identity is in the making and, further, how is this sense of identity supposed to be transmitted to newcomers? While the White Paper does not touch upon what exactly these key understandings and values are and what type of community Britain aims to be, it does reveal how it plans to transmit these abstract concepts to newcomers: “we intend to offer language teaching and light touch education for citizenship for those making a home in the UK – with a view to a simple examination for citizenship applicants similar to that which exists in many other countries” (ibidem: 12). Thus the White Paper provides us with information about the government’s primary intentions: to build and strengthen national identity, and to transmit these values to newcomers via citizenship and language testing. However, it does not go into the nature of this national identity, besides stating that the values are conceived in Human Rights.

This task was left to the ‘Life in the UK’ Advisory Group. Here, the report explicitly asks: “Who are we British” and “What are our values?”. And answers with key words like: respect for equal rights, mutual tolerance, and understanding of differences. “To be British seems to us to mean that we respect the laws, the elected parliamentary and democratic political structures, traditional values of mutual tolerance, respect for equal rights and mutual concern” (Point 2.7: 13). Not only do citizens need to take pride in these values, but they should also actively engage in using them. The idea that newcomers should be given tools to actively participate in the society is the reason behind making the Life in the UK handbook more practical in nature, focused on the initial introduction to the British civic society and its institutions, to encourage people to actively and voluntarily participate in the society, which will then lead to contact with settled inhabitants and other new citizens that makes for a deeper sense of national identity.

The aim of the new naturalization procedures is to encourage those who become British citizens to play an active role in the economic, civic and social life of the country and to have a sense of belonging to a wider community. (...) There must also be mutual respect and acceptance within shared and common principles. (...) Knowing about the

laws and about the over-arching political and state institutions is an important step in becoming active and responsible citizens (ABNI 2006: 24).

These aspects point to a national identity that is best described by the third level of the pyramid discussed earlier, and thus the concept of civic patriotism. The Advisory Board mentions pride in political institutions and stresses the importance of a civic communal membership. In making reference to British traditions and history, it does not completely separate the cultural dimension of identity, but stresses that this comes with time and deeper integration. What proponents of civic patriotism do emphasize, and what is supported by the work of the Advisory Board, is that there needs to be a thin cultural lining supporting the civic identity and political institutions, and the identificatory (rather than just instrumental) role of the latter (Laborde 2002: 13). What is important to note is that the process of national identity making is seen here as an active participation of citizens, which is largely based on the work of Thomas Humphrey Marshall's concept of citizenship as based on civil, political and social rights, but focused on social bonds based on community involvement.

The fact that these integration policies are for the first time intended also for the spouses of British citizens (in large part women), is evidence that the transmission of these values is geared towards those who are at highest risk of exclusion. "There are those dependants who may be potentially housebound because lack of English or limited awareness of cultural difference" (Home Office 2003: 8), and thus those are who these integration policies are aimed towards. The emphasis here is thus not on enshrining the values themselves, but making active use of them in the participation of civic life, especially by those who are less civically orientated.

Because the value of equality is not intrinsic to the British society itself, but is a part of liberal-democratic ideals based on the respect for human rights and rule of law, it does enshrine the universalist principles that comprise the fourth level of national identity. The way in which these lofty universalist ideals become a part of national identity is, as Parekh notes, when they are appropriated as British – they are given a cultural sense (in Laborde 2002: 610). While in the *New and the Old* this appropriation of values is not evident, we will see how the value of equality is given a more 'British' sense in the analysis of the handbook on integration in the next section.

The French documents relating to the new integration policies are clearly more focused on women's rights, particularly women coming from immigrant backgrounds. The report deals with two issues considered salient to the po-

licies of integration and their reformulation: the social promotion of youth in 'difficult' districts, and the rights of women coming from immigrant backgrounds. Almost 40 pages out of 164 are dedicated to the latter, and aim to directly influence policy-making by outlining principles, giving pointers and seeking new orientations (Haut Conseil à l'intégration 2003: 3). The accent that the report wishes to place is on 'positive policies' focused on a more 'individual integration' (ibidem). What this means in practice is to consider these immigrants in their entirety, and to recognise, by distinctions and promotions, the merits they have gained. Individual integration has at its base the Rights of Man, whether they are **'women or men'** (bolded in report) (ibidem: 4). These integration policies need not be confused with assimilation policies of before, since, according to the report, there is a great deal of liberty for individual choice and cultural traditions, as long as they do not undermine the principles of the Republic (ibidem).

At the onset, we see that the report is confronting 'us' (and our Republican values) with 'them' (and their oppressive lack of women's rights). The tone set in the report is that of a duty to 'liberate' women of immigrant backgrounds from their oppressive cultural binds, by using the contract as a tool to change this situation. According to the report, women from immigrant backgrounds are particularly vulnerable to discrimination and to the confines of their cultures. According to the report, these women often find themselves stuck between the law and culture of their country of origin, international laws governing human rights, and 'French Republican' laws and culture safeguarding the rights of women (ibidem: 45). The most sensitive issues at hand are: repudiation, violence against women (i.e. forced marriages and polygamy), parental authority and the treatment of women (ibidem). It is quite obvious which cultural backgrounds these issues are referring to: in referring to 'personal status' – a concept in international law that holds that a person's status does not change when going from one state to another and is forged by their country of origin, is here problematic. In bold, it states that "the conception of personal status is profoundly different in Muslim countries than that of French law" (ibidem: 46).

How does the French Republic aim to tackle these issues? Firstly, it aims to improve the awareness of problems faced by immigrant women; next, it seeks to reinforce information provided to newcomers about their rights; thirdly, it will support the learning of the French language to those who are in need; privilege the 'law of domicile' in order to protect women from oppressive laws in their countries of origin; prevent and fight against sexual mutilations and forced marriages; and finally, introduce policies of information for young girls in



schools about their rights and freedoms (ibidem: 72). According to the report, all this is intended to proceed in a manner that does not try to impose certain 'values' or French culture, but that strictly adheres to the teaching of the law.

In a democratic republic, the state does not seek to impose values, for it allows citizens the liberty to choose, to believe or not to believe, to decide on their private norms. (...) To present the common values and principles of the Republic as if they were purely the products of a historical tradition which should be respected is erroneous (ibidem: 84).

The tone of the report may come as a rebuttal to accusations, in France and Britain, and indeed other countries pursuing policies of 'civic integration', that these measures are some kind of litmus tests of immigrants' ability to become French or British, to adhere to an abstract national identity of "Britishness" or "Frenchness". The criticisms of these policies find that these abstract values and identities are not even espoused by citizens themselves, and are thus unfair requirements to be asked of immigrants. Perhaps partly in response to these criticisms and also due to a need to define the state's stance towards these policies, France has chosen a route best typified by civic nationalism: it does not allude to universalist abstract values but rather to the institutions of the state and particularly, the Republic's Constitution. According to the report, the state and the *Haut Conseil à l'intégration* do *not* wish to teach new arrivals to assimilate their behaviour, neither do they want to 'moralise' newcomers, but, simply, to teach them the law: the Constitution (ibidem: 85).

We may thus conclude that while France and Britain seem to be converging in their public philosophies concerning citizenship and policies of immigration and integration (as analysed in the first section), they have maintained slightly different approaches to this matter. While Britain is reaching to abstract universalist (yet common) values and a sense of belonging, the French rhetoric is – at least in official documentation – focused on purely civic integration and the adherence to Republican principles enshrined in the Constitution. Even though both these states are focusing heavily on promoting civic participation to induce cohesion and integration, it would be erroneous to say that these two countries are converging in the content of these integration policies: Britain is focused, generally speaking, on the history of changes in the British system, while France is concerned mainly with the vulnerability of immigrant women within its borders. Britain is trying to grapple with its difficult colonial past and seeking to juggle multiculturalism while creating a strong common core; meanwhile, France seems to be fighting against the discriminatory practices that are infiltrating the country from outside.

Regarding the institutional self-perception of these two states, we can make some preliminary remarks at the juncture, and return to this question at the end of the last section and the analysis of the integration handbooks themselves. As was mentioned earlier, Britain comes close to a Habermasian 'constitutional patriotism' model that focuses on espousing universalist values while carefully adding a 'British' spin to the issue. France, whilst also alluding to the universalist values enshrined in the Rights of Man and Citizen, focuses on a Republican identity that is forged by the Constitution and the law. As we will see below, the way in which they transmit these values is quite distinct from one another, and this may on one hand teach us much about these countries identities and approaches to these issues, and on the other hand determine if the way these issues are transmitted can be differently perceived by the migrants themselves.

## The form and content of integration handbooks – what is being transferred to hopeful citizens?

This last section aims to answer the question of how the discourse of the value of equality was actually reflected in the handbooks themselves, composed of the British *Journey to Citizenship* handbook and the French *Livret d'accueil: vivre en France* (Welcome handbook: living in France), as well as the film *Vivre ensemble, en France* (Living together in France). It also aims to draw some preliminary conclusions as to how these values may be interpreted by readers of these handbooks, in focusing on the style and content used.

A linguistic discourse analysis approach was chosen here that focused on three main questions: are these issues written in a descriptive or prescriptive fashion? (You must send your children to school or those parents who do not send their children to school may be prosecuted.) Is the language passive or active (Brits value equality *or* research has shown that equality is valued in Britain)? Are women's rights and their role in society presented tacitly or explicitly? The answers to these three questions will help to ascertain if the transfer of values is explicit or latent, which in turn may be used to deduce how effective the transfer of national identity to newcomers is in these two countries.

It is first important to establish what level of importance issues of gender equality take in the make-up of these handbooks. While not going into great detail about the differences in general form between the French and British

texts (the British one being bound in hard copy and consisting of 145 pages filled with colour photos and extra tidbits, the French one accessible in electronic version and consisting of 66 pages with only cartoon-style drawings), here the author sees a similarity in the order women's issues are placed: both are at the forefront of the information transmitted. In the French *livret*, right after the introduction about French institutions, is the sub-heading "equality of rights". The first part of this section deals mostly with race and ethnic issues, and discrimination. It admits to the fact that although all forms of discrimination, particularly racial, are forbidden, there are cases to the contrary, in which case those victims should report to their local institutions, or *La Haute autorité de lutte contre les discriminations et pour l'égalité* (The High Authority to Combat Discrimination and Fight for Equality). The second large sub-heading is entitled *L'égalité hommes et femmes* (the equality between men and women), and consecrates a whole page to this issue.

The British handbook also places women's issues high on its list of priorities. While the first chapter is a historical overview of Britain, it is not intended for the civic integration test, and so serves as an introduction to the necessary material. Chapter 2, "A Changing Society", starts with migration to Britain and the multicultural aspect of the state, but then quickly jumps to "The Changing Role of Women". A whole page is also afforded to this issue in the British handbook, although, as we will see, the content and tone differ significantly. At the onset, we can make a comment on the two titles: the French one is quite sure of itself in that the title is a statement of the equality between men and women. This is a fact. The British one, however, emphasizes the change, or progress that has been made in the area of women's rights and their role in society. The former is quite explicit in its statement, the latter is rather tacit. The French text explicitly states that equality between men and women is a fundamental French value and that it applies to all those who are living on French soil. It goes on into the private sphere: in the family, husband and wife are equal and have an equal say in decisions pertaining to the couple, including children. Further, women do not need the permission of their husbands in order to work or to open up a bank account. Marriage is tackled next, particularly the laws concerning it (the freedom to get married or not) and against forced marriages. In France, polygamy is illegal, notes the *livret*, and those who do not comply with this law will have a difficult time in being accepted and integrating into the French society.

What can be made of this text? The first instinct is that the content is a response to those who do not understand the French values of equality. It is

compelled to spell out the law, even encroaching into the private sphere of the home in order to make its point. The consequences of not complying with this value are also clear: ostracism and rejection by the French society. The freedom of speech and thought (i.e. the right to have a say in private matters) and the freedom of sexual liberty (i.e. the right to choose one's own partner and not to be subjected to polygamy), are the two main issues here, protected diligently by the French state and a matter of *fact*.

Further, in the film *Vivre ensemble, en France*, the narrator reasserts that France is 'very attached' to the principle of equality between men and women. Indeed, it has appropriated this value in order to construct its strong identity of equality. It further notes that men and women, according to the law, are equal in all aspects of life: social life, family life, professional and other. The film underlines the fact, as does the *livret*, that women do not need authorization, but adds that they do not need it from the husbands, brothers or fathers. In a relationship, women and men are equal and make decisions together. What is interesting here is that the film is explicit in who women are equal to in the micro-structure. Not only men in general, but specifically their loved ones (it does not mention abuse of authority in the professional sphere, for example). This may lead us to the conclusion that the text is aimed particularly at those women who have very strong familial ties, and especially those who are likely to be in a position of inferiority in relation to their husbands, brothers and fathers. We can assume with a great deal of certainty that this refers to the strong ties within the Muslim faith. These cultural/religious differences are not accepted in France, reads the text.

The British text is made of a completely different fabric. It starts off with 19<sup>th</sup> century Britain, where women had fewer rights than men, and indeed a woman did not have the right to divorce her husband until 1857, and she and her property belonged to her husband. It then goes on to the progress in women's rights and the history of the 'Suffragettes', who lobbied for women's right to vote and finally won the right on equal footing as men in 1928. Still, women faced discrimination, and so in the 1970s there were finally laws passed that prohibited discrimination against women in the workplace. Today, it points out that women have better qualifications than men, and opportunities are much better than before. Attitudes are changing and there is growing equality at home; however, there still needs to be more done to achieve greater equality. The task is not finished, and the text points to the inequalities that still exist (i.e. lower pay).

In the careful British text, attention is paid not to sound hypocritical; it is very cautious in making broad generalizations about the value of equality and its reflection in the British society. Is this not a vestige of its self-cautious colonial past that would not dare to impose its values on anyone else? To impose an identity on someone is both politically incorrect and intrinsically un-British, it seems. Instead, it focuses on the progress made in the areas of women's rights, detailing the history and the struggles along the way, and although we have come a long way, there is always more to be done in assuring equality. We are not perfect, it states between the lines, but we do try. This self-defacing yet optimistic tone is indeed something that many would deem 'inherently' or 'culturally' British.

The analysis of the language used offers another level of interpretation of the content of these two handbooks. How the text sounds, what kind of tone it has and what it makes clear or not, is important when analyzing how this information may be received by those readers interested in the subject, namely newcomers applying for permanent residence or citizenship. Firstly, is the language passive or active? Is the text written in reported speech (passive), or does it emphasize affirmative action? The British text is filled with phrases such as:

**There is strong evidence** that attitudes are changing, and women are now active in a much wider range of work than before. **Research shows** that very few people today believe that women in Britain should stay at home and not go to work. (...) **There is evidence that** there is now greater equality in homes (...). Despite this progress, **many people believe that** more needs to be done to achieve greater equality for women [bolded phrases – author's emphasis].

Implicitly, we should understand that women are active in the workforce and that there is greater equality than there was before. Because this is mentioned in the first chapters of the handbook, we assume it is an important issue. However, the tone is extremely passive – embedded in research and surveys and what some may believe, thus the notion that Britain itself adheres to the equality of women may be perceived as somewhat vague. This passive style is what one could explain as political correctness that represents an intangible, underlying aspect of British national identity. This tone is contrasted by the French handbook, which is quite confident and straightforward in its transfer of information: it states that equality is very important, not that there exists evidence that it is.

The principle of equality between men and women is a fundamental principle of the French society. Women do not need the authorisation of their husbands. Parents make decisions together.

There is no room for interpretation here – the statements are quite explicit in their message. The French are not trying to better women's opportunities, they simply exist as a matter of principle. This type of style also has an underlying prescriptive nature: do not engage in polygamous marriages if you want to be accepted into French society. In stating that women do not need the authorisation of their husbands, it is telling women who may have doubts that they should not ask for their authorisation – it is against French values. This tone is echoed in other parts of the *livret*, notably in terms of raising children.

Your children will learn a lot at school; they will make friends. They will also prepare themselves for their future professional and personal life. You can help them to succeed. (...) When your children are having difficulty in following the class-work, show them that you want to help them get through their difficulties. Each evening, ask them what they have to do for school. If there is too much noise around them at that moment, they won't be able to concentrate. Shut off the television then!

The French handbook goes as far as telling the parents who are reading the handbook to shut off their television, if needed. The voice permeating through the text is not afraid of telling its reader to do this and that in order to be a good citizen. The handbook almost reads as a step-by-step list of things you must do to be a French citizen. The British handbook, contrarily, dares not to tell people what to do. Instead, it is descriptive, reciting the history of women's rights, or at the most, implicitly suggestive:

Very few people today believe that women in Britain should stay at home and not go to work. (...) Many people believe that more needs to be done to achieve greater equality for women.

If very few people believe, we can infer that the opposite is a British value, and if many people believe, we may venture to say that it is a common idea amongst Brits. Another interesting linguistic technique in the British text is the use of comparatives and superlatives to make the text relative in its context, not to pin it down as objective truth, as in the French text.

Girls leave school (...) with **better** qualifications **than** boys and there are **more** women than men at university. Employment opportunities are now **much greater than** they were in the past. (...) Women are now active in a **much wider** range of work **than** before. There is now **greater** equality in homes and **more** men are taking **some of** the responsibility (...). Women still earn **less than** men.

It is evident that the British text is implicit in its underlying meanings – a typical British understatement, one might say. The way in which values are transmitted says something about the nature of the national identity of a country, and this may be of particular interest for the researcher. While British

national identity is reflected as subtle and explicitly distant and vague – due no doubt to its colonial history and delicate relationship with national identity – the French identity is much more explicit. The way it is written is the way it is done in France, is what the reader may infer. There is no hesitation, no self-doubt nor self-criticism in the latter, it is simply stating the truth.

The argument for clarity in transmitting knowledge and information to new migrants is on one hand quite convincing and is made well by Tariq Modood:

Clarity about what makes us willingly bound into a single country relieves the pressure on minorities, especially new minorities whose presence within the country is not fully accepted, to have to conform in all areas of social life, or in arbitrarily chosen areas, in order to rebut the charge of disloyalty. [Absence of clarity] allows politicians unsympathetic to minorities to demand that they demonstrate loyalty by doing *x* or *y* or *z*, like supporting the national cricket team in Norman Tebbit's famous example (in Laborde 2002: 608).

While Modood is advocating a clear conception of what national belonging is, it can also be taken further to talk about how clearly this conception is transmitted. If the language is too complex, subtle, and distant, it may not carry as much significance to the reader as a text that is explicit in its meaning. On the other hand, however, we might be in danger of committing graver mistakes by making the language more explicit, namely: simplifying the language so that it becomes no more than a 'dummy's guide to citizenship' and representing a false, idealised conception of the society instead of the reality that migrants need to integrate into. Suffice to say that the way in which the message is transmitted does indeed have a significant bearing on how it is interpreted by the receiver and must be something that policy-makers are aware of.

## Conclusions

The last decade has seen a significant shift in approaches to immigration and integration across countries in Europe, towards policies of 'civic integration' and language and culture testing of new immigrants. This trend has surfaced both in France and Britain, which traditionally have differed greatly in their conceptions of citizenship, the state and integration issues. Observers of these trends have noted a type of rupture in these traditional philosophies of integration and a convergence of these two models – the multiculturalist and centrist Republican – into something in between. France, as we have seen, has started borrowing ideas of anti-discrimination policies from multiculturalism

theories in light of the growing inequalities buried beneath the surface of *liberté, égalité* and *fraternité* that is meant to be for all. Given the fact that the French state trumpets these principles as the foundation of French nationality, it is increasingly apparent that there are those who are not treated accordingly. Britain, on the other hand, has needed to shift its attention away from the much criticised philosophy of multiculturalism and has instead focused on building a strong 'glue' with which it hopes to hold the society together: common core values and a feeling of belonging akin to centrist Republican ideology long held in France.

What has this meant for the consideration of women's rights in these two countries? In Britain, equality has surfaced as the core of British values, and more robust policies have been put into place, based on the rhetoric surrounding Britain's 'common future' filled with 'common values'. The Equality Bill of 2009 is a case in point: drawing on the rhetoric surrounding values, it introduces women's rights and equality rights in general as the "heart of public policy". In terms of integration policies, we can see a stronger stance, particularly by former Home Secretary David Blunkett, against inequality that is sometimes cloaked by cultural differences; however, women's rights issues are not at the heart of *integration* policy. This is a stark difference from France, which focused almost solely on issues of inequality experienced by immigrant women. The report entitled *Le Contrat et l'intégration* (The Integration Contract) prepared by the *Haut Conseil à l'intégration*, which was a precursor to changes made in the *Contrat d'accueil* (Welcome contract) and civic integration courses, devoted half of its report to the issues of women's rights for immigrants, and made clear that this was a top priority on the French integration agenda.

While there is discussion to a greater or lesser degree about women's rights and how they pertain to issues of immigration and integration, the two states have approached this manner in two diverse ways. The British have aimed to identify themselves with overarching universalist values that have been appropriated to some extent as 'British', but have focused on the evolution of these values in light of change and progress that has been made in the last century. The proof of this lies in the 'Journey to Citizenship' handbook made available to newcomers. Thus while political rhetoric moves towards a strong sense of British identity and sense of belonging, the handbook is still conscious to focus on what the British society is becoming, not what it stands for in a definitive way. The French institutional self-perception is much different in this regard. The handbook confirms what the French Republic stands for (and has always stood for) in terms of equality, and is confident in its appropriation



of these values: they are born of the French Constitution, the Republic and its laws. The French stance is one of defender of French values, which must be shown to newcomers not through indoctrination of French culture, but of simply laying down the law.

While these two states both conform to the fourth level of identity in terms of propagating universalist values and being careful not to impose rhetoric of cultural or ethnic identity, and while both focus on civic participation as an essential part of integration, the tone of their rhetoric still points to differences in how they identify with these issues. In the analysis of the handbooks, these differences are all too apparent. While the British text is inherently implicit in its tone, passive and descriptive in character, politically correct and aware not to be patronizing, the French text is the opposite: explicit, straightforward and prescriptive. There is no hint of self-doubt or self-criticism in the latter, it is firm in what it wants to transmit to future citizens.

The discussion in the last section pointed to the advantages and disadvantages of the two approaches: one, while being politically correct may not be clear and firm enough for the newcomer; the other, while being self-confident and direct may fall into hypocrisy and false notions of the realities of its society. The goal here rests the same: to provide newcomers with an introduction to the countries' society so that they may better integrate and become aware of what is expected of them in these new surroundings. The way in which it is transmitted to the newcomer may have a significant bearing on how she interprets these values and how she identifies with the society. The ensemble of these policies, from the way migrants are received at the borders, to how they are treated within the society and what tools they have to integrate, as well as how these values are 'instilled' into them, have a significant impact on whether these immigrants feel included into the society or pushed to its extremities. Suffice to say that there is much more work and research to be done to critically examine the impact of these new policies in the real integration of migrants and the process towards a more cohesive society.

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